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Attorneys for Defendant Facebook, Inc.,

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**JOINT NOTICE CONCERNING
THE ESI PROTOCOL AND THE
502(D) STIPULATION**

The parties respectfully submit this joint notice in accordance with paragraphs 1 and 2 of Discovery Order No. 1 (ECF 404). Attached to this joint notice are the current drafts of stipulations concerning an ESI Protocol (Exh. A) and a 502(d) order (Exh. B). Each attached draft stipulation contains all of the provisions on which the parties have reached agreement and notes the few provisions as to which the parties are still working to reach agreement. The parties will meet and confer on these last remaining provisions in accordance with paragraphs 1 and 2 of Discovery Order No. 1 and will submit either fully agreed versions of these stipulations or joint letter briefs addressing any outstanding issues in the two stipulations by 5:00 p.m. on Monday.

Dated: April 24, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Orin Snyder, hereby certify that on April 24, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Orin Snyder
Orin Snyder